

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CYVA RESEARCH HOLDINGS, LLC,

Plaintiff,

v.

VIVID SEATS LTD. *et al.*,

Defendant.

Civil Action No. 2:14-CV-01009

JURY TRIAL DEMANDED

LEAD CASE

JOINT MOTION TO STAY DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff CYVA Research Holdings, LLC (“Plaintiff”), and Defendant Gunbroker.com, LLC (“Gunbroker”) have reached an agreement in principal that resolves all claims asserted between Plaintiff and Gunbroker in the above-entitled and numbered action. The parties expect to jointly file a dismissal with prejudice of all claims between them within 30 days. Accordingly, Plaintiff and Gunbroker respectfully request the Court stay all deadlines between them for 30 days, up to and including April 13, 2015. Plaintiff and Gunbroker request this Stay, not for the purposes of any delay, but so that they may finalize and file dismissal papers without incurring additional expenses.

Dated: March 12, 2015

By: /s/ Stevenson Moore

Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com
Timothy T. Wang
Texas Bar No. 24067927
twang@nilawfirm.com
Neal G. Massand
Texas Bar No. 24039038
nmassand@nilawfirm.com
Stevenson Moore V
Texas Bar No. 24076573
smoore@nilawfirm.com

Ni, Wang & Massand, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF CYVA
RESEARCH HOLDINGS, LLC**

FISH & RICHARDSON P.C.

/s/ Carl E. Bruce
Carl E. Bruce
Texas Bar No. 24036278
ceb@fr.com
Matthew A. Colvin
Texas Bar No. 24087331
colvin@fr.com
1717 Main Street, Suite 5000
Dallas, Texas 75201
Telephone (214) 747-5071
Facsimile (214) 747-2091

J. Scott Anderson
Georgia Bar No. 017266
SAnderson@CulhaneMeadows.com
CULHANE MEADOWS HAUGHIAN
& WALSH, PLLC
534 Medlock Road, Suite 103
Decatur, Georgia 30030-1514
Telephone (404) 806-1488
Facsimile (888) 909-0255

**ATTORNEYS FOR
GUNBROKER.COM, LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile, and/or first class mail on this date

/s/ Stevenson Moore
Stevenson Moore